

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Fortis Corporate Insurance, as
subrogee of Empire Resources, Inc.
Plaintiff,

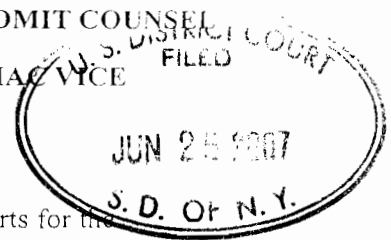
07 cv03731 (VM)

- against -

Total Quality Logistics, Inc.,
et al.,
Defendant.

MOTION TO ADMIT COUNSEL

PRO HAC VICE



PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, **Sung Yong Ahn**, a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: **Charles M. Miller**
Firm Name: **Keating Muething & Klekamp, PLL**
Address: **One East Fourth Street, Suite #1400**
City/State/Zip: **Cincinnati, OH 45202-3752**
Phone Number: **(513) 579-6967**
Fax Number: **(513) 579-6457**

Charles M. Miller is a member in good standing of the Bar of the States of **OHIO**

There are no pending disciplinary proceeding against **Charles M. Miller**
in any State or Federal court.

Dated **June 21, 2007**

City, State: **New York, N.Y.**

Respectfully submitted,

Sponsor's **Sung Yong Ahn**
SDNY Bar **(SA-3773)**
Firm Name: **Pak & Cho, P.C.**
Address: **21222 Anderson Ave.**
City/State/Zip: **Fort Lee, NJ 07024**
Phone Number: **(201) 886-0200**
Fax Number: **(201) 886-0111**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FORTIS CORPORATE INSURANCE, as
subrogee of Empire Resources, Inc.,

07-cv-03731 (VM)

Plaintiff,

- against -

TOTAL QUALITY LOGISTICS, INC., et al.,

Defendant.

**AFFIDAVIT OF
SUNG Y. AHN
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
County of New York) ss:

Sung Yong Ahn, being duly sworn, hereby deposes and says as follows:

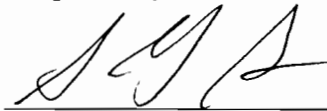
1. I am an associate at Pak & Cho, P.C., counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Charles M. Miller as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February of 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Charles M. Miller is an associate at Keating Muething & Klekamp, PLL, in Cincinnati, Ohio.
4. I have known Charles M. Miller since 1999. Based on my knowledge of and interaction with Charles M. Miller I have found him to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move for the admission of Charles M. Miller, pro hac vice.
6. I respectfully submit a proposed order granting the admission of Charles M. Miller, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Charles M. Miller, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

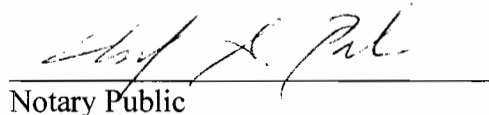
DATED: June 22, 2007
New York, New York

Respectfully submitted,



Sung Yong Ahn
SDNY Bar Code: (SA 3773)

Sworn to me before this 22nd day of June, 2007.


Notary Public

CHUL SOO PAK
Notary Public - State of New York
No. 02PA4973932
Qualified in New York County
My Commission Expires Jan. 24, 2011

The Supreme Court of Ohio

C E R T I F I C A T E

I, RICHARD A. DOVE, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Attorney Registration Section of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Charles Michael Miller

was admitted to the practice of law in Ohio on November 13, 2001; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 7th day of June, 2007.

RICHARD A. DOVE
Director, Attorney Services Division


Attorney Registration Assistant

United States District Court Northern District of Ohio

CERTIFICATE OF GOOD STANDING

I, Geri M. Smith, Clerk of the United States District Court
for the Northern District of Ohio, certify that

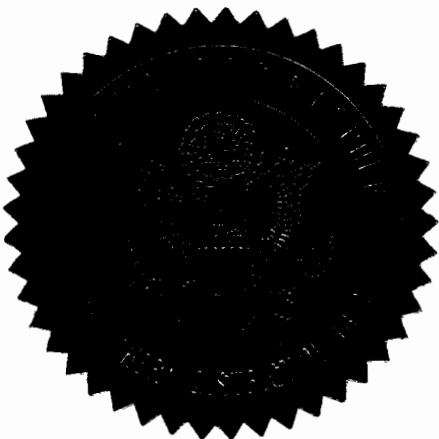
Charles M. Miller

was admitted to practice in this Court on May 7, 2002,
and is in good standing as a member of the bar of this Court.

Dated at Toledo, Ohio,
on June 15, 2007.

Gerri M. Smith,
Clerk

By Danne Gowing,
Attorney Admissions Clerk



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

**CERTIFICATE OF
GOOD STANDING**

I, James Bonini, Clerk of this Court, certify that

CHARLES M. MILLER, BAR #0073844

was duly admitted to practice in this Court on

July 2, 2003

and is in good standing as a member of the Bar of this Court.

Dated at Cincinnati, Ohio on June 12, 2007.




JAMES BONINI, CLERK

UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

TO ALL WHOM IT MAY CONCERN, GREETINGS:

THIS IS TO CERTIFY THAT


CHARLES M. MILLER,

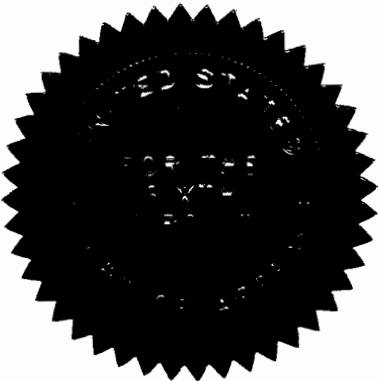
OF **CINCINNATI**, STATE OF **OHIO**, WAS ON MOTION, FIRST MADE TO
THE COURT ON **HIS** BEHALF, DULY ADMITTED AND QUALIFIED AS AN
ATTORNEY AND COUNSELOR OF THE UNITED STATES COURT OF
APPEALS FOR THE SIXTH CIRCUIT ON THE **NINETEENTH** DAY OF
APRIL, IN THE YEAR OF OUR LORD TWO THOUSAND AND SIX, AND
THAT **HE**, IS NOW IN GOOD STANDING.

In Testimony Whereof, I Leonard Green,
Clerk of said Court, have hereunto set my
hand and affixed the seal of the said
Court, at the City of Cincinnati, Ohio this
13th day of **June** in the year of our Lord
two thousand and seven.

Leonard Green

Clerk, United States Court of Appeals
for the Sixth Circuit


Lance Gifford
Deputy Clerk



SDNY (Rev. 10/2006) Order for Admission Pro Hac Vice on Written Motion

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Fortis Corporate Insurance, as
subrogee of Empire Resources, Inc.
Plaintiff,

07 cv03731 (VM)

- against -
Total Quality Logistics, Defendant.
Inc., et al.,

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Sung Y. Ahn attorney for Total Quality Logistics, Inc.
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Charles M. Miller

Firm Name: Keating Muething & Klekamp, PLL

Address: One East Fourth Street, Suite #1400

City/State/Zip: Cincinnati, OH 45202-3752

Telephone/Fax: (513) 579-6967

Email Address: CMILLER@KMKLAW.COM

is admitted to practice pro hac vice as counsel for Total Quality Logistics in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State

United States District/Magistrate Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FORTIS CORPORATE INSURANCE, as
subrogee of Empire Resources, Inc.,

07-cv-03731 (VM)

Plaintiff,

- against -

TOTAL QUALITY LOGISTICS, INC., et al.,

Defendant.

CERTIFICATE OF SERVICE

Sung Yong Ahn, says under penalty of perjury that:

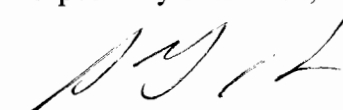
- 1) I am an attorney licensed to practice in the State of New York and that I am admitted to the United States District Court for the Eastern District of New York. As counsel for the above captioned Defendant Total Quality Logistics, Inc. I am fully familiar with the facts set forth herein.
- 2) That I am sponsoring the application for pro hac vice admission of Mr. Charles M. Miller on behalf of Total Quality Logistics, Inc.
- 3) That I caused to be mailed true copies of a) my Affidavit in Support of Pro Hac Vice application, b) proposed order, c) four certificates of good standing of Charles M. Miller and a d) motion for admission pro hac vice to be served on the parties and in a the manner stated in the following paragraph.
- 4) True copies of the above enumerated documents were deposited into envelopes and mailed by first class mail on June 22, 2007 to the following parties and addresses;

Mr. Roman Badiak, Esq.
Badiak & Will, LLP
106 Third Street
Mineola, NY 11501-4404
Attorney for Plaintiff Fortis Corporate Insurance

Mr. Bennett Susser, Esq.
Sills Cummins Epstein & Gross, PC
30 Rockefeller Center
New York, NY 10112
Attorney for Defendant Hills' Trucking, Inc.

DATED: June 22, 2007
New York, New York

Respectfully submitted,



Sung Yong Ahn (SA 3773)
PAK & CHO, P.C.
1222 Anderson Avenue
Fort Lee, NJ 07024
Tel: (201) 886-0200
Fax: (201) 886-0111